

ADUBATO & JAFFE, ESQS.  
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Attorneys for Defendant,  
Galitano Gjoni

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :	HON. JOSE LINARES, U.S.D.J.
Plaintiff, :	
vs. :	CRIM. NO. 11-00184-001 (JL)
GALITANO GJONI, :	<b>CERTIFICATION OF COUNSEL</b>
Defendant. :	<b>IN SUPPORT OF MOTION FOR</b>
	<b>FOR EARLY TERMINATION OF</b>
	<b>PROBATION.</b>

MICHELE A. ADUBATO, ESQ., of full age, hereby certifies  
and says:

1. I am an Attorney-at-Law of the State of New Jersey and  
admitted to practice before the United States District Court,  
District of New Jersey.

2. I represented Galitano Gjoni in the above-captioned  
action.

3. Pursuant to an agreement with the government, the  
Defendant entered a plea on March 29, 2011 to an information;  
charging conspiracy to distribute MDMA (ecstasy), in violation 21  
U.S.C. § 841 (a) 841 (b)(1)( c ) and 846.

4. The Defendant was sentenced on January 28, 2014, to a  
three year probationary term. Prior to that date, defendant had  
been on pre-trial release since 2009 without incident. This was

his first criminal offense.

5. The Defendant's term of probation will terminate on January 28, 2017.

6. The defendant is 31 years of age and is employed by a building management company in New York City as an management executive.

7. Mr. Gjoni came to this country in 2006. His legal status was as a refugee with asylum status.

8. He graduated from the College of Staten Island in May, 2011 with honors. He hopes to be enrolled for a masters degree in Construction Administration in September, 2015.

9. Mr. Gjoni has applied for legal residence status. He has been informed by his immigration attorney that his application status would improve if his probation was terminated.

10. Mr. Gjoni's probation officer (New York Office) is aware of this application. Although indicating that Mr. Gjoni has not had any problems on probation, probation will not take a formal position on this application.

11. The Assistant United States Attorney who handled the matter was also previously advised of the application and has been served with a copy.

12. The Defendant respectfully moves before the Court for an Order of Early Termination of Probation pursuant to 18 U.S.C. § 3546 ( c ).

13. For all of the foregoing reasons, it is respectfully

submitted that the defense motion should be granted, and that an Order should be entered that the Defendant's term of probation be terminated.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Michele A. Adubato  
MICHELE A. ADUBATO, ESQ.  
ATTORNEY AT LAW OF NEW JERSEY

Dated: March , 2015